

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

KENNETH FLEMING, JOHN DOE, R.K.,
and T.D.,

Plaintiffs,

v.

THE CORPORATION OF THE PRESIDENT
OF THE CHURCH OF JESUS CHRIST OF
LATTER-DAY SAINTS, a Utah corporation
sole, a/d/a "MORMON CHURCH"; LDS
SOCIAL SERVICES a/d/a LDS FAMILY
SERVICES, a Utah corporation,

Defendants.

NO. C04-2338 RSM

**SUPPLEMENTAL DECLARATION OF
MICHAEL T. PFAU IN SUPPORT OF
PLAINTIFF'S MOTION TO COMPEL**

**NOTE ON MOTION CALENDAR:
JANUARY 13, 2006**

I, Michael T. Pfau am over the age of 18 and am competent to testify as follows:

1. I am attorney for the Plaintiffs in this case. I have personal knowledge of the facts and circumstances that surround this motion.

2. On November 29th, 2005, I along with my co-counsel held a Rule 37 discussion with Marcus Nash, counsel for the Church of Latter Day Saints, about the issues set forth in this motion.

DECLARATION OF MICHAEL T. PFAU - 1 of 2
(C04-2338 RSM)
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4. In our Rule 37 conference, the parties agreed that defense counsel would turn over the names of non-party victims that Bishop Coleman became aware of during his time as bishop, excluding communications from counsel, that plaintiffs would then keep those names confidential, and that the parties would enter into a Stipulated Protective Order.

5. Attached as **Exhibit 1** is a true and correct copy of the cover page of the deposition of Richard Pettit dated December 13, 2005.

6. Attached as **Exhibit 2** is a true and correct copy of excerpts of the deposition of Randall Borland.

7. Attached as **Exhibit 3** is a true and correct copy of excerpts of the deposition of Philip Coleman.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED at Seattle, Washington this 13 day of January, 2006.

DATED at Seattle, Washington this 13 day of January, 2006.

Michael T. Pfau